

GURBIR S. GREWAL
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Christopher Kuberiet*

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
VICINAGE OF NEWARK

Nijer Parks, Plaintiff, v. Christopher Kuberiet et als., Defendant.	Civil Action No. 2:21-CV-04021-MCA-LDW NOTICE OF MOTION TO DISMISS PLAINTIFFS' COMPLAINT PURSUANT TO FED.R.CIV.P. 12(b)(1) AND FED.R.CIV.P. 12(b)(6)
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TO: CLERK OF THE COURT
United State District Court
District of New Jersey, Newark Vicinage
Martin Luther King, Jr. Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, New Jersey 07101

Daniel W. Sexton, Esq.
Daniel W. Sexton, LLC.
2229 New Centre Road
Hillsborough, NJ 08844

Fredrick L. Rubenstein, Esq.
James T. Nolan & Associates, LLC
61 Green Street

Woodbridge, New Jersey 07095

Lori A. Dvorak, Esq.
Dvorak & Associates, LLC
467 Middlesex Avenue
Metuchen, New Jersey 08840

PLEASE TAKE NOTICE that on June 7, 2021, the undersigned Gurbir S. Grewal, Attorney General of New Jersey, by Jordynn Jackson, Deputy Attorney General, on behalf of Defendant, Christopher Kuberiet shall move before the Honorable Madeline Cox Arleo, U.S.D.J., in the United States District Court House, Martin Luther King, Jr. Building & U.S. Courthouse 50 Walnut Street, Room 5054 Newark, New Jersey 07101, pursuant to FED.R.CIV.P. 12(b)(1) and FED.R.CIV.P. 12(b)(6), for an Order dismissing plaintiff's Complaint. Defendant will rely on the brief and certification of counsel being filed simultaneously with this Notice of Motion.

It is respectfully requested that the Court rule upon the moving papers submitted, without requiring appearance of counsel, pursuant to L. Civ. R. 78.1, unless opposition is filed by plaintiff.

A proposed form of Order is attached hereto

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
By:

/s/ Jordynn Jackson
Jordynn Jackson (ID 270752019)
Deputy Attorney General

Dated: April 23, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2021, the foregoing was filed electronically with the Clerk of the United States District Court and was served upon all parties via UPS overnight mail as follows:

Daniel W. Sexton, Esq.
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By: s/ Jordynn Jackson
Jordynn Jackson (ID 270752019)
Deputy Attorney General

Dated: April 23, 2021